



## City of Moorpark

CITY ENGINEER/PUBLIC WORKS DEPARTMENT

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6256 fax (805) 532-2555

June 7, 2010

via email July082010VCMS4@waterboards.ca.gov

Mr. Sam Unger Interim Executive Officer Los Angeles Regional Water Quality Control Board 320 4th Street, Suite 200 Los Angeles, CA 90013

SUBJECT: Comments on Reconsideration of the National Pollutant Discharge Elimination System Permit (Tentative Order/NPDES No. CAS004002) for the Ventura County Watershed Protection District, the County of Ventura and Incorporated Cities Therein (Municipal Separate Storm Sewer System)

Dear Mr. Unger:

In reference to the above subject, the City of Moorpark (City) wishes to inform you that we have completed our review and offers the following comments. The City supports the majority of the June 4, 2010 Ventura Countywide Stormwater Management Program (Ventura Program) Chair, Gerhardt Hubner, letter and attachments thereof addressed to you. The City would also like to emphasize a few comments.

As mentioned in the Ventura Program's letter, the City has committed significant resources towards permit compliance and has accomplished many tasks. The City completed its prioritization of catch basins by levels received through a map and table. The City has also developed its Integrated Pest Management Program and looks forward to implementing new practices to reduce its use of pesticides and fertilizers. Although the City's monitoring program is not scheduled to begin until FY 2010/11, it is our understanding that the City's monitoring station will be ready and the City looks forward to seeing the results.

The City concurs with the Ventura Program's letter recommending revisions to the Tentative Order to provide a mechanism for making adjustments to the BMPs to ensure their adequate performance. As stated in previous comment letters, Moorpark is one of many stakeholders that have worked together collaboratively towards improving water quality, in the Calleguas Creek Watershed and it appreciates the Tentative Order's requirements being consistent with the adopted TMDLs for this watershed.

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The City appreciates the Tentative Order's inclusion of a comprehensive approach for addressing trash in Ventura County. The City supports taking an aggressive approach to trash management. The Tentative Order provides the Permittees with the necessary flexibility to prioritize drainage systems for trash generation, and subsequent clean-up and removal. Furthermore, the Tentative Order allows the Permittees to develop alternative approaches that reflect the nature and composition of the municipality. The City supports the flexibility provided for in the Tentative Order and encourages the Regional Board to continue providing the flexibility needed to tailor municipal programs for relevant and identified water quality issues.

The City looks forward to your response to these comments and the comments in the Ventura Program's letter and attachments thereof. We would again like to emphasize our commitment to the collaborative effort in maintaining and enhancing water quality in our watersheds. Please feel free to contact Mr. Shaun Kroes at (805) 517-6257 if you have any questions regarding these comments. Thank you.

Sincerely

Yugal K. Lall P.E.

City Engineer/Public Works Director

c: Honorable City Council Steven Kueny, City Manager Shaun Kroes, Senior Management Analyst Gerhardt Hubner, VCWPD Renee Purdy, LARWQCB